

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

NOTICE OF MOTION AND MOTION
22-MJ-143

vs.

DISHANT PATEL

Defendant.

PLEASE TAKE NOTICE, that the undersigned DOMINIC SARACENO, ESQ., attorney for the defendant, DISHANT PATEL, based upon the following affirmation, hereby moves the court for permission for the defendant to travel to 2863 Graham Rd Apt 8, Stow, OH 44224 between the dates of 11/10/23 to 11/12/23 for the Diwali Festival, 11/22/23 to 11/26/23 for thanksgiving, and 12/15/23 to 12/31/23 for Christmas break. Defendant also moves the Court to allow his probation officer to grant permission to travel rather than having to petition the Court for every request.

AFFIRMATION

1. I am an attorney at law duly licensed to practice in the State of New York and in the Western District of New York with offices located at 534 Delaware Avenue, Buffalo, New York 14202.
2. This affirmation is offered in support of counsel's request to allow the defendant permission to travel.
3. More specifically, the defendant would like to travel to Ohio to visit relatives over the dates referenced above.
4. Defendant would be staying at the address referenced above.

5. Defendant is also asking the Court to give his probation officer the authority to grant travel requests.
6. I spoke to his probation supervisor in the Southern District of Indiana, Tara Olson, and she has no objection to these requests.
7. The defense counsel is making this motion on behalf of DISHANT PATEL.

WHEREFORE, for the reasons set forth above, defendant, DISHANT PATEL, respectfully requests an Order from this Court allowing him to travel to the location referenced above on the dates referenced above, and to permit his probation officer to grant future travel requests.

s/ Dominic Saraceno, Esq.

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CERTIFICATE OF SERVICE

22-MJ-143

I hereby certify that on November 1, 2023, I electronically filed the foregoing with the Clerk of the District Court using its CM/ECF system, which would then electronically notify the following EM/EF Participant on this case:

AUSA JOHN FABIAN, AUSA
138 Delaware Avenue
Buffalo, New York 14202

s/Dominic Saraceno

DOMINIC SARACENO